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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

Case No.: 2:23-cv-00482-RJS

**STIPULATED MOTION FOR
TEMPORARY ORDER
REGARDING DEFENDANT
TRAVIS FLAHERTY’S LIVING
EXPENSES**

Chief Judge Robert J. Shelby

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRTZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Plaintiff Securities and Exchange Commission (“Commission”) and Defendant Travis Flaherty have agreed and stipulated, and hereby move the Court, for a proposed order providing for certain living and business expenses for Defendant Flaherty during the pendency of the Temporary Restraining Order. A proposed stipulated Order is attached hereto as Exhibit A.

Dated: August 25, 2023

**U.S. SECURITIES AND EXCHANGE
COMMISSION**

/s/ Michael E. Welsh

MICHAEL E. WELSH

CASEY R. FRONK

*Attorneys for Petitioner U.S. Securities and
Exchange Commission*

Dated: August 25, 2023

MARIA WINDHAM

/s/ Jose Abarca

(by Casey Fronk with emailed
permission)_____

POLSINELLI PC.

Attorney for Defendant Travis Flaherty

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of August, 2023, I caused the foregoing **STIPULATED MOTION FOR TEMPORARY ORDER REGARDING DEFENDANT TRAVIS FLAHERTY’S LIVING EXPENSES** to be served to all parties entitled to service through the Court’s ECF system.

/s/ Casey R. Fronk

Casey R. Fronk